

This document gives pertinent information concerning the reissuance of the VPDES Permit listed below. This permit is being processed as a minor, industrial permit. The discharge results from the operation of a small jobber, bulk oil terminal and commercial fueling islands. The effluent limitations and special conditions contained in this permit will maintain the Water Quality Standards of 9 VAC 25-260-00 et seq.

1. Facility Name and Mailing Address: Culpeper Petroleum Cooperative
15297 Brandy Road
Culpeper, VA 22701
SIC Code : 5171, 5983
Facility Location: Northwest Corner of the intersection of State Route 666 and business route 15/29. County: Culpeper
Facility Contact Name: Mr. Kevin Corbin Telephone Number: 540-825-9651
2. Permit No.: VA0085723 Current Expiration Date: 29 June 2008
Other VPDES Permits: Not Applicable
Other Permits: VAD988228474 – RCRA
E2/E3/E4 Status: Not Applicable
3. Owner Name: Culpeper Petroleum Cooperative
Owner Contact/Title: Kevin Corbin / Manager Telephone Number: 540-825-9651
4. Application Complete Date: 3 January 2008
Permit Drafted By: Douglas Frasier Date Drafted: 12 February 2008
Draft Permit Reviewed By: Alison Thompson Date Reviewed: 14 February 2008
Public Comment Period: Start Date: 12 March 2008 End Date: 11 April 2008
5. Receiving Waters Information: See **Attachment 1** for the Flow Frequency Determination
Receiving Stream Name: Mountain Run, UT
Drainage Area at Outfall: < 1 square mile River Mile: 1.23
Stream Basin: Rappahannock River Subbasin: None
Section: 4 Stream Class: III
Special Standards: None Waterbody ID: VAN-E09R
7Q10 Low Flow: 0.0 MGD 7Q10 High Flow: 0.0 MGD
1Q10 Low Flow: 0.0 MGD 1Q10 High Flow: 0.0 MGD
Harmonic Mean Flow: 0.0 MGD 30Q5 Flow: 0.0 MGD
303(d) Listed: No 30Q10 Flow: 0.0 MGD
TMDL Approved: Yes – downstream Date TMDL Approved: 27 April 2001
6. Statutory or Regulatory Basis for Special Conditions and Effluent Limitations:

<input checked="" type="checkbox"/> State Water Control Law <input checked="" type="checkbox"/> Clean Water Act <input checked="" type="checkbox"/> VPDES Permit Regulation <input checked="" type="checkbox"/> EPA NPDES Regulation	<input type="checkbox"/> EPA Guidelines <input checked="" type="checkbox"/> Water Quality Standards <input type="checkbox"/> Other
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7. Licensed Operator Requirements: Not Applicable
8. Reliability Class: Not Applicable

9. Permit Characterization:

<input checked="" type="checkbox"/> Private	<input type="checkbox"/> Effluent Limited	<input type="checkbox"/> Possible Interstate Effect
<input type="checkbox"/> Federal	<input checked="" type="checkbox"/> Water Quality Limited	<input type="checkbox"/> Compliance Schedule Required
<input type="checkbox"/> State	<input type="checkbox"/> Toxics Monitoring Program Required	<input type="checkbox"/> Interim Limits in Permit
<input type="checkbox"/> POTW	<input type="checkbox"/> Pretreatment Program Required	<input type="checkbox"/> Interim Limits in Other Document
<input type="checkbox"/> TMDL		

10. Wastewater Sources and Treatment Description:

Culpeper Petroleum Cooperative operates a small jobber, bulk oil terminal. They store, handle and distribute gasoline, kerosene, diesel fuel and #2 fuel oil. Fuel is delivered to Culpeper Petroleum Cooperative via tanker truck and is distributed locally by four wagon delivery trucks to homes, construction sites and trucking companies.

In addition to the retail of bulk fuel, Culpeper Petroleum Cooperative has an automotive service and repair garage with three bays, retail hardware and farm supply storage and two commercial fueling islands for retail sale of gasoline and diesel. The cooperative serves Culpeper, Rappahannock, Orange, Madison and Fauquier counties.

Garage bay wastes such as waste oil and spent coolant are collected and disposed offsite. All pesticides and fertilizers are sold in pre-packaged containers.

Wastewater is generated from surface spills and rinse down of the concrete pads at the bulk loading rack and commercial fueling islands. The bulk loading rack and the commercial fueling islands are canopied and curbed to minimize contact with storm water; however, storm water has the potential to contact these areas during heavy precipitation. Rinse water, spills and storm water from the loading rack and commercial fueling islands flow into six inlets connected to an oil/water separator. Oil spills at the fueling islands are cleaned through use of an absorbent material. Another source of wastewater is accumulated storm water from the containment dikes around the above ground storage tanks. Accumulated storm water is periodically pumped to a nearby inlet connected to the oil water separator via a portable pump.

The oil/water separator (Highland Tank Oil/Water Separator, Model HT-100) is a 1,000-gallon capacity underground tank with a corrugated parallel plate rack. The separator has a maximum rated flow of 100 gpm. The separator removes free-floating oil and settleable oily solids from oil/water mixtures. The separator is capable of meeting a TPH limit of 15 mg/l.

The discharge from the oil/water separator enters a ditch, which flows to an unnamed tributary of Mountain Run that eventually converges with Mountain Run near the railroad tracks located on the east of Route 29.

Culpeper Petroleum Cooperative has a Spill Prevention and Countermeasure Plan on file with the Department of Environmental Quality, Northern Regional Office (DEQ-NRO).

See **Attachment 2** for the NPDES Permit Rating Worksheet.

See **Attachment 3** for a facility schematic/diagram.

TABLE 1 Outfall Description				
Outfall Number	Discharge Sources	Treatment	Maximum Design Flow	Outfall Latitude and Longitude
001	Industrial Wastewater (oil/water separator)	See Item 10 above.	0.144 MGD	38° 29' 10.1" N 77° 58' 04.6" W
See Attachment 4 for topographic map.				

11. Sludge Treatment and Disposal Methods:

The handling and disposal of the sediment and sludge that accumulates in the oil-water separator shall be in accordance with the approved Operation and Maintenance Manual.

12. Discharges, Intakes, Monitoring Stations, Other Items in Vicinity of Discharge:

TABLE 2 Facilities and Monitoring Stations		
Permit Number	Facility	Type
VAR051087	Quarles Petroleum – Culpeper	industrial discharge
VA0059145	Culpeper Wood Preservers	industrial discharge
VA0061590	Town of Culpeper STP	municipal discharge
VA0062529	Ferguson STP	municipal discharge (not built)
VAG110101	Colonial Concrete – Culpeper Plant	industrial discharge
VA0087149	Mount Dumpling STP	municipal discharge
VA0090212	Mountain Run WWTP	municipal discharge
VAG840107	Luck Stone – Culpeper	industrial discharge

13. Material Storage:

TABLE 3 Material Storage		
Materials Description	Volume Stored	Spill/Stormwater Prevention Measures
Aboveground Storage		
#2 Fuel Oil	One 500 gallon tank	Contained within concrete dike. The dike is pumped to the oil/water separator as necessary and BMPs.
Diesel & Additives	One 550 gallon tank	
Biodiesel	One 1000 gallon and one 500 gallon tank	
Motor oil, hydraulic and transmission fluids	55 gallon drums	BMPs.
LPG	Two 30,000 gallon tanks	Contained within concrete dike. The dike is pumped to the oil/water separator as necessary and BMPs.
Used Motor Oil/Antifreeze	One 500 gallon tank	
Underground Storage		
Regular Unleaded	One 20,000 gallon tank	Double walled/monitored tanks.
Mid-Grade Unleaded	One 20,000 gallon tank	
Super Unleaded	One 20,000 gallon tank	
Kerosene	One 20,000 gallon tank	
Diesel	One 20,000 gallon tank	
#2 Fuel Oil	One 20,000 gallon tank	

14. Site Inspection: Performed by NRO staff on 20 March 2007 (see **Attachment 5**).

15. Receiving Stream Water Quality and Water Quality Standards:**a). Ambient Water Quality Data**

There is no ambient monitoring data available for the receiving stream. The closest monitoring station is located approximately 6.93 rivermiles downstream. A bacteria TMDL was approved on 27 April 2001 for Mountain Run. The receiving stream was not included in the TMDL since it was not listed as impaired, but all upstream facilities were considered in the WLAs. This facility was not given a WLA for bacteria since it does not discharge the pollutant of concern.

b). Receiving Stream Water Quality Criteria

Part IX of 9 VAC 25-260 (360-550) designates classes and special standards applicable to defined Virginia river basins and sections. The receiving stream Mountain Run, UT is located within Section 4 of the Rappahannock River Basin, and classified as Class III water.

At all times, Class III waters must achieve a dissolved oxygen (D.O.) of 4.0 mg/L or greater, a daily average D.O. of 5.0 mg/L or greater, a temperature that does not exceed 32°C, and maintain a pH of 6.0-9.0 standard units (S.U.).

Attachment 6 details other water quality criteria applicable to the receiving stream.

c). Receiving Stream Special Standards

The State Water Control Board's Water Quality Standards, River Basin Section Tables (9 VAC 25-260-360, 370 and 380) designates the river basins, sections, classes and special standards for surface waters of the Commonwealth of Virginia. The receiving stream, Mountain Run, UT, is located within Section 4 of the Rappahannock River Basin. This section has not been designated with a special standard.

d). Threatened or Endangered Species

The Virginia DGIF Fish and Wildlife Information System Database was searched for records to determine if there are threatened or endangered species in the vicinity of the discharge. The following threatened or endangered species were identified within a 2 mile radius of the discharge: Loggerhead Shrike (song bird). The limits proposed in this draft permit are protective of the Virginia Water Quality Standards and therefore, protect the threatened and endangered species found near the discharge.

16. Antidegradation (9 VAC 25-260-30):

All state surface waters are provided one of three levels of antidegradation protection. For Tier 1 or existing use protection, existing uses of the water body and the water quality to protect these uses must be maintained. Tier 2 water bodies have water quality that is better than the water quality standards. Significant lowering of the water quality of Tier 2 waters is not allowed without an evaluation of the economic and social impacts. Tier 3 water bodies are exceptional waters and are so designated by regulatory amendment. The antidegradation policy prohibits new or expanded discharges into exceptional waters.

The receiving stream has been classified as Tier 1 based on critical flows at 7Q10 and 1Q10 of 0.0 MGD. Permit limits proposed have been established by determining wasteload allocations which will result in attaining and/or maintaining all water quality criteria which apply to the receiving stream, including narrative criteria. These wasteload allocations will provide for the protection and maintenance of all existing uses.

17. Effluent Screening, Wasteload Allocation, and Effluent Limitation Development:

To determine water quality-based effluent limitations for a discharge, the suitability of data must first be determined. Data is suitable for analysis if one or more representative data points are equal to or above the quantification level ("QL") and the data represent the exact pollutant being evaluated.

Next, the appropriate Water Quality Standards (WQS) are determined for the pollutants in the effluent. Then, the Wasteload Allocations (WLAs) are calculated. In this case since the critical flows 7Q10 and 1Q10 have been determined to be zero, the WLAs are equal to the WQS. The WLA values are then compared with available effluent data to determine the need for effluent limitations. Effluent limitations are needed if the 97th percentile of the daily effluent concentration values is greater than the acute wasteload allocation or if the 97th percentile of the four-day average effluent concentration values is greater than the chronic wasteload allocation. Effluent limitations are based on the most limiting WLA, the required sampling frequency, and statistical characteristics of the effluent data.

a). Effluent Screening:

Effluent data were reviewed and there have been no exceedances of the established limitations. DMR data is included in the permit reissuance file.

b). Mixing Zones and Wasteload Allocations (WLAs):

Wasteload Allocations (WLAs) are calculated for those parameters in the effluent with the reasonable potential to cause an exceedance of water quality criteria. The basic calculation for establishing a WLA is the steady state complete mix equation:

$$WLA = \frac{C_o [Q_e + (f)(Q_s)] - [(C_s)(f)(Q_s)]}{Q_e}$$

Where:

WLA	=	Wasteload allocation
C _o	=	In-stream water quality criteria
Q _e	=	Design flow
Q _s	=	Critical receiving stream flow (1Q10 for acute aquatic life criteria; 7Q10 for chronic aquatic life criteria; harmonic mean for carcinogen-human health criteria; 30Q10 for ammonia criteria; and 30Q5 for non-carcinogen human health criteria)
f	=	Decimal fraction of critical flow
C _s	=	Mean background concentration of parameter in the receiving stream.

The water segment receiving the discharge via Outfall 001 is considered to have a 7Q10 and 1Q10 of 0.0 MGD. As such, there is no mixing zone and the WLA is equal to the C_o.

c). Effluent Limitations Toxic Pollutants, Outfall 001

9 VAC 25-31-220.D. requires limits be imposed where a discharge has a reasonable potential to cause or contribute to an in-stream excursion of water quality criteria. Those parameters with WLAs that are near effluent concentrations are evaluated for limits.

The VPDES Permit Regulation 9 VAC 25-31-230.D. requires that monthly and weekly average limitations be imposed for continuous discharges from POTWs and monthly average and daily maximum limitations be imposed for all other continuous non-POTW discharges.

d). Effluent Limitations and Monitoring, Outfall 001 – Conventional and Non-Conventional Pollutants

No changes to the Total Recoverable Petroleum Hydrocarbons (TPH) and pH limitations are proposed.

TPH limitations are based on DEQ guidance and the technology-based demonstrated capability of the oil/water separator.

pH limitations are set at the water quality criteria.

e). Effluent Limitations and Monitoring Summary.

The effluent limitations are presented in the following table. Limits were established for TPH and pH.

Sample Type and Frequency are in accordance with the recommendations in the VPDES Permit Manual.

18. Antibacksliding:

All limits in this permit are at least as stringent as those previously established. Backsliding does not apply to this reissuance.

19. Effluent Limitations/Monitoring Requirements:

Maximum Rated Flow for the Oil/Water Separator is 0.144 MGD.

Effective Dates: During the period beginning with the permit's effective date and lasting until the expiration date

PARAMETER	BASIS FOR LIMITS	DISCHARGE LIMITATIONS				MONITORING REQUIREMENTS	
		<u>Monthly Average</u>	<u>Daily Maximum</u>	<u>Minimum</u>	<u>Maximum</u>	<u>Frequency</u>	<u>Sample Type</u>
Flow (MGD)	NA	NL	N/A	N/A	NL	1/M	EST
pH	3	N/A	N/A	6.0 S.U.	9.0 S.U.	1/M	Grab
Total Petroleum Hydrocarbons*	2,3	N/A	N/A	N/A	15 mg/L	1/M	Grab

The basis for the limitations codes are:

1. Federal Effluent Requirements
2. Best Professional Judgement
3. Water Quality Standards

MGD = Million gallons per day.

1/M = Once every month.

N/A = Not applicable.

NL = No limit; monitor and report.

S.U. = Standard units.

EST = Reported flow is to be based on the technical evaluation of the sources contributing to the discharge.

Grab = An individual sample collected over a period of time not to exceed 15-minutes.

*Total Petroleum Hydrocarbons (TPH) shall be analyzed using the Wisconsin Department of Natural Resources Modified Diesel Range Organics Method as specified in Wisconsin publication SW-141 (1995), or by EPA SW-846 Method 8015B (1996) for diesel range organics, or by EPA SW-846 Method 8270C (1998). If Method 8270C is used, the lab must report the combination of diesel range organics and polynuclear aromatic hydrocarbons.

20. Other Permit Requirements:

- a). Part I.B. of the permit contains quantification levels and compliance reporting instructions.

9 VAC 25-31-190.L.4.c. requires an arithmetic mean for measurement averaging and 9 VAC 25-31-220.D. requires limits be imposed where a discharge has a reasonable potential to cause or contribute to an in-stream excursion of water quality criteria. Specific analytical methodologies for toxics are listed in this permit section as well as quantification levels (QLs) necessary to demonstrate compliance with applicable permit limitations or for use in future evaluations to determine if the pollutant has reasonable potential to cause or contribute to a violation. Required averaging methodologies are also specified.

- b). Permit Section Part I.C. details the requirements of a Storm Water Management Plan.

9 VAC 25-31-10 defines discharges of storm water from municipal treatment plants with a design flow of 1.0 MGD or more, plants with approved pretreatment programs or discharges of storm water associated with industrial activity. 9 VAC 25-31-120 requires a permit for these discharges. The Pollution Prevention Plan requirements are derived from the VPDES general permit for discharges of storm water associated with industrial activity, 9 VAC 25-151-10 et seq.

21. Other Special Conditions :

- a). O&M Manual Requirement. Required by Code of Virginia §62.1-44.19; Sewage Collection and Treatment Regulations, 9 VAC 25-790; VPDES Permit Regulation, 9 VAC 25-31-190.E. Before or on 1 October 2008, the permittee shall submit for approval a revised Operations and Maintenance (O&M) Manual to the Department of Environmental Quality, Northern Regional Office (DEQ-NRO). Future changes to the facility must be addressed by the submittal of a revised O&M Manual within 90 days of the changes. Non-compliance with the O&M Manual shall be deemed a violation of the permit.
- b). Notification Levels. The permittee shall notify the Department as soon as they know or have reason to believe:
- a. That any activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, of any toxic pollutant which is not limited in this permit, if that discharge will exceed the highest of the following notification levels:
 - (1) One hundred micrograms per liter;
 - (2) Two hundred micrograms per liter for acrolein and acrylonitrile; five hundred micrograms per liter for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter for antimony;
 - (3) Five times the maximum concentration value reported for that pollutant in the permit application; or
 - (4) The level established by the Board.
 - b. That any activity has occurred or will occur which would result in any discharge, on a nonroutine or infrequent basis, of a toxic pollutant which is not limited in this permit, if that discharge will exceed the highest of the following notification levels:
 - (1) Five hundred micrograms per liter;
 - (2) One milligram per liter for antimony;
 - (3) Ten times the maximum concentration value reported for that pollutant in the permit application; or
 - (4) The level established by the Board.

- c). BMP. The Best Management Practices (BMP) plan for control of leaks, spills and storm water runoff from the facility shall be reviewed, revised and submitted for staff approval before or on 1 October 2008. The BMP plan becomes an enforceable part of the permit. The permittee shall amend the BMP plan whenever there is a change in the facility or operation of the facility which materially increases the potential to discharge significant amounts of pollutants or if the BMP plan proves to be ineffective in preventing the release of significant amounts of pollutants. Changes to the BMP plan shall be submitted for staff approval within 90 days of the effective date of the changes. Upon approval, the amended BMP plan becomes an enforceable part of the permit.
- d). Materials Handling/Storage. 9 VAC 25-31-50 A prohibits the discharge of any wastes into State waters unless authorized by permit. Code of Virginia §62.1-44.16 and §62.1-44.17 authorize the Board to regulate the discharge of industrial waste or other waste.
- e). No Discharge of Detergents, Surfactants, or Solvents to the Oil/Water Separators. This special condition is necessary to ensure that the oil/water separators' performance is not impacted by compounds designed to emulsify oil. Detergents, surfactants and some other solvents will prohibit oil recovery by physical means.
22. Permit Section Part II. Part II of the permit contains standard conditions that appear in all VPDES Permits. In general, these standard conditions address the responsibilities of the permittee, reporting requirements, testing procedures and records retention.
23. **Changes to the Permit from the Previously Issued Permit:**
- a). Special Conditions: None
- b). Monitoring and Effluent Limitations: None
24. **Variances/Alternate Limits or Conditions:** None
25. **Public Notice Information:**
- First Public Notice Date: 11 March 2008 Second Public Notice Date: 18 March 2008
- Public Notice Information is required by 9 VAC 25-31-280 B. All pertinent information is on file and may be inspected and copied by contacting the: Northern DEQ Regional Office, 13901 Crown Court, Woodbridge, VA 22193, Telephone No. (703) 583-3873, ddfrasier@deq.virginia.gov. See **Attachment 7** for a copy of the public notice document.
- Persons may comment in writing or by email to the DEQ on the proposed permit action, and may request a public hearing, during the comment period. Comments shall include the name, address and telephone number of the writer, and shall contain a complete, concise statement of the factual basis for comments. Only those comments received within this period will be considered. The DEQ may decide to hold a public hearing if public response is significant. Requests for public hearings shall state the reason why a hearing is requested, the nature of the issues proposed to be raised in the public hearing and a brief explanation of how the requester's interests would be directly and adversely affected by the proposed permit action. Following the comment period, the Board will make a determination regarding the proposed permit action. This determination will become effective, unless the DEQ grants a public hearing. Due notice of any public hearing will be given.
26. **303 (d) Listed Stream Segments and Total Max. Daily Loads (TMDL):** The receiving stream is not listed as impaired. A downstream TMDL for Mountain Run was approved on 27 April 2001 for bacteria. All upstream facilities were considered when calculating the WLAs. This facility was not given a WLA since it is not a source of the pollutant of concern.
- TMDL Reopener: This special condition is to allow the permit to be reopened if necessary to bring it into compliance with any applicable TMDL that may be developed and approved for the receiving stream.
27. **Additional Comments:**
- Previous Board Action(s): Not Applicable
- Staff Comments: Not Applicable
- Public Comment: No comments were received during the public notice.
- EPA Checklist: The checklist can be found in **Attachment 8**.

Fact Sheet Attachments – Table of Contents

Culpeper Petroleum Cooperative VA0085723 2008 Reissuance

Attachment 1	Flow Frequency Determination
Attachment 2	NPDES Permit Rating Worksheet
Attachment 3	Facility Schematic/Diagram
Attachment 4	Topographic Map
Attachment 5	Site Inspection Report
Attachment 6	Wasteload Allocation Analysis
Attachment 7	Public Notice
Attachment 8	EPA Checklist

MEMORANDUM

DEPARTMENT OF ENVIRONMENTAL QUALITY - WATER DIVISION
Water Quality Assessments and Planning
629 E. Main Street P.O. Box 10009 Richmond, Virginia 23240

SUBJECT: Flow Frequency Determination
Culpeper Petroleum Cooperative - #VA0085723

TO: Lyle Anne Kent, NRO

FROM: Paul E. Herman, P.E., WQAP *Paul*

DATE: January 22, 1998

COPIES: Ron Gregory, Charles Martin, File

The Culpeper Petroleum Cooperative discharges to an unnamed tributary of the Mountain Run near Culpeper, VA. Flow frequencies are required at this site for use by the permit writer in developing effluent limitations for the VPDES permit.

The values at the discharge point were determined by inspection of the USGS Culpeper East Quadrangle topographical map which shows the receiving stream as intermittent at the discharge point. The flow frequencies for intermittent streams are 0.0 cfs for the 1Q10, 7Q10, 30Q5, high flow 1Q10, high flow 7Q10, and the harmonic mean.

If you have any questions concerning this analysis, please let me know.

NPDES PERMIT RATING WORK SHEETVPDES NO. : VA0085273

- ☒ Regular Addition
☐ Discretionary Addition
☐ Score change, but no status Change
☐ Deletion

Facility Name: Culpeper Petroleum CooperativeCity / County: Culpeper / CulpeperReceiving Water: Mountain Run, UT

Reach Number: _____

Is this facility a steam electric power plant (sic =4911) with one or more of the following characteristics?

1. Power output 500 MW or greater (not using a cooling pond/lake)
 2. A nuclear power Plant
 3. Cooling water discharge greater than 25% of the receiving stream's 7Q10 flow rater

Is this permit for a municipal separate storm sewer serving a population greater than 100,000?

- ☐ YES; score is 700 (stop here)
☒ NO; (continue)

☐ Yes; score is 600 (stop here) ☒ NO; (continue)

FACTOR 1: Toxic Pollutant Potential

PCS SIC Code: _____ Primary Sic Code: 5171 Other Sic Codes: 5983
 Industrial Subcategory Code: 000 (Code 000 if no subcategory)

Determine the Toxicity potential from Appendix A. Be sure to use the TOTAL toxicity potential column and check one)

Toxicity Group	Code	Points	Toxicity Group	Code	Points	Toxicity Group	Code	Points
<input checked="" type="checkbox"/> No process waste streams	0	0	<input type="checkbox"/> 3.	3	15	<input type="checkbox"/> 7.	7	35
<input type="checkbox"/> 1.	1	5	<input type="checkbox"/> 4.	4	20	<input type="checkbox"/> 8.	8	40
<input type="checkbox"/> 2.	2	10	<input type="checkbox"/> 5.	5	25	<input type="checkbox"/> 9.	9	45
			<input type="checkbox"/> 6.	6	30	<input type="checkbox"/> 10.	10	50

Code Number Checked: 0**Total Points Factor 1:** 0**FACTOR 2: Flow/Stream Flow Volume** (Complete either Section A or Section B; check only one)

Section A – Wastewater Flow Only considered

Wastewater Type (see Instructions)	Code	Points
Type I: Flow < 5 MGD	<input type="checkbox"/> 11	0
Flow 5 to 10 MGD	<input type="checkbox"/> 12	10
Flow > 10 to 50 MGD	<input type="checkbox"/> 13	20
Flow > 50 MGD	<input type="checkbox"/> 14	30
Type II: Flow < 1 MGD	<input checked="" type="checkbox"/> 21	10
Flow 1 to 5 MGD	<input type="checkbox"/> 22	20
Flow > 5 to 10 MGD	<input type="checkbox"/> 23	30
Flow > 10 MGD	<input type="checkbox"/> 24	50
Type III: Flow < 1 MGD	<input type="checkbox"/> 31	0
Flow 1 to 5 MGD	<input type="checkbox"/> 32	10
Flow > 5 to 10 MGD	<input type="checkbox"/> 33	20
Flow > 10 MGD	<input type="checkbox"/> 34	30

Section B – Wastewater and Stream Flow Considered

Wastewater Type (see Instructions)	Percent of Instream Wastewater Concentration at Receiving Stream Low Flow	Code	Points
Type I/III:	< 10 %	<input type="checkbox"/> 41	0
	10 % to < 50 %	<input type="checkbox"/> 42	10
	> 50%	<input type="checkbox"/> 43	20
Type II:	< 10 %	<input type="checkbox"/> 51	0
	10 % to < 50 %	<input type="checkbox"/> 52	20
	> 50 %	<input type="checkbox"/> 53	30

Code Checked from Section A or B: 21**Total Points Factor 2:** 10

NPDES PERMIT RATING WORK SHEET

FACTOR 3: Conventional Pollutants

(only when limited by the permit)

A. Oxygen Demanding Pollutants: (check one) ☐ BOD ☐ COD ☐ Other: _____

Permit Limits: (check one)

		Code	Points
<input type="checkbox"/>	< 100 lbs/day	1	0
<input type="checkbox"/>	100 to 1000 lbs/day	2	5
<input type="checkbox"/>	> 1000 to 3000 lbs/day	3	15
<input type="checkbox"/>	> 3000 lbs/day	4	20

Code Number Checked: NA**Points Scored:** 0

B. Total Suspended Solids (TSS)

Permit Limits: (check one)

		Code	Points
<input type="checkbox"/>	< 100 lbs/day	1	0
<input type="checkbox"/>	100 to 1000 lbs/day	2	5
<input type="checkbox"/>	> 1000 to 5000 lbs/day	3	15
<input type="checkbox"/>	> 5000 lbs/day	4	20

Code Number Checked: NA**Points Scored:** 0C. Nitrogen Pollutants: (check one) ☐ Ammonia ☐ Other: _____

Permit Limits: (check one)

	<i>Nitrogen Equivalent</i>	Code	Points
<input type="checkbox"/>	< 300 lbs/day	1	0
<input type="checkbox"/>	300 to 1000 lbs/day	2	5
<input type="checkbox"/>	> 1000 to 3000 lbs/day	3	15
<input type="checkbox"/>	> 3000 lbs/day	4	20

Code Number Checked: NA**Points Scored:** 0**Total Points Factor 3:** 0**FACTOR 4: Public Health Impact**

Is there a public drinking water supply located within 50 miles downstream of the effluent discharge (this include any body of water to which the receiving water is a tributary)? A public drinking water supply may include infiltration galleries, or other methods of conveyance that ultimately get water from the above reference supply.

☒ YES; (If yes, check toxicity potential number below)☐ NO; (If no, go to Factor 5)

Determine the *Human Health* potential from Appendix A. Use the same SIC doe and subcategory reference as in Factor 1. (Be sure to use the *Human Health* toxicity group column – check one below)

Toxicity Group	Code	Points	Toxicity Group	Code	Points	Toxicity Group	Code	Points
<input type="checkbox"/> No process waste streams	0	0	<input type="checkbox"/> 3.	3	0	<input type="checkbox"/> 7.	7	15
<input type="checkbox"/> 1.	1	0	<input type="checkbox"/> 4.	4	0	<input checked="" type="checkbox"/> 8.	8	20
<input type="checkbox"/> 2.	2	0	<input type="checkbox"/> 5.	5	5	<input type="checkbox"/> 9.	9	25
			<input type="checkbox"/> 6.	6	10	<input type="checkbox"/> 10.	10	30

Code Number Checked: 8**Total Points Factor 4:** 20

NPDES PERMIT RATING WORK SHEET**FACTOR 5: Water Quality Factors**

- A. *Is (or will) one or more of the effluent discharge limits based on water quality factors of the receiving stream (rather than technology-base federal effluent guidelines, or technology-base state effluent guidelines), or has a wasteload allocation been to the discharge*

	Code	Points
<input checked="" type="checkbox"/> YES	1	10
<input type="checkbox"/> NO	2	0

- B. *Is the receiving water in compliance with applicable water quality standards for pollutants that are water quality limited in the permit?*

	Code	Points
<input checked="" type="checkbox"/> YES	1	0
<input type="checkbox"/> NO	2	5

- C. *Does the effluent discharged from this facility exhibit the reasonable potential to violate water quality standards due to whole effluent toxicity?*

	Code	Points
<input type="checkbox"/> YES	1	10
<input checked="" type="checkbox"/> NO	2	0

Code Number Checked: A 1 B 1 C 2
Points Factor 5: A 10 + B 0 + C 0 = 10

FACTOR 6: Proximity to Near Coastal Waters

- A. Base Score: Enter flow code here (from factor 2) _____

Check appropriate facility HPRI code (from PCS):

Enter the multiplication factor that corresponds to the flow code: 0.6

HPRI#	Code	HPRI Score	Flow Code	Multiplication Factor
<input type="checkbox"/> 1	1	20	11, 31, or 41	0.00
<input type="checkbox"/> 2	2	0	12, 32, or 42	0.05
<input type="checkbox"/> 3	3	30	13, 33, or 43	0.10
<input type="checkbox"/> 4	4	0	14 or 34	0.15
<input checked="" type="checkbox"/> 5	5	20	21 or 51	0.10
			22 or 52	0.30
			23 or 53	0.60
			24	1.00

HPRI code checked : 4

Base Score (HPRI Score): 0 X (Multiplication Factor) 0.6 = 0

- B. Additional Points – NEP Program

For a facility that has an HPRI code of 3, does the facility discharge to one of the estuaries enrolled in the National Estuary Protection (NEP) program (see instructions) or the Chesapeake Bay?

Code	Points	N/A
<input type="checkbox"/> 1	10	
<input type="checkbox"/> 2	0	

- C. Additional Points – Great Lakes Area of Concern

For a facility that has an HPRI code of 5, does the facility discharge any of the pollutants of concern into one of the Great Lakes' 31 area's of concern (see instructions)?

Code	Points	N/A
<input type="checkbox"/> 1	10	
<input type="checkbox"/> 2	0	

Code Number Checked: A 4 B 2 C 2
Points Factor 6: A 0 + B 0 + C 0 = 0

NPDES PERMIT RATING WORK SHEET

SCORE SUMMARY

<u>Factor</u>	<u>Description</u>	<u>Total Points</u>
1	Toxic Pollutant Potential	<u>0</u>
2	Flows / Streamflow Volume	<u>10</u>
3	Conventional Pollutants	<u>0</u>
4	Public Health Impacts	<u>20</u>
5	Water Quality Factors	<u>10</u>
6	Proximity to Near Coastal Waters	<u>0</u>
	TOTAL (Factors 1 through 6)	<u>40</u>

S1. Is the total score equal to or greater than 80 ☐ YES; (Facility is a Major) ☒ NO

S2. If the answer to the above questions is no, would you like this facility to be discretionary major?

☒ NO

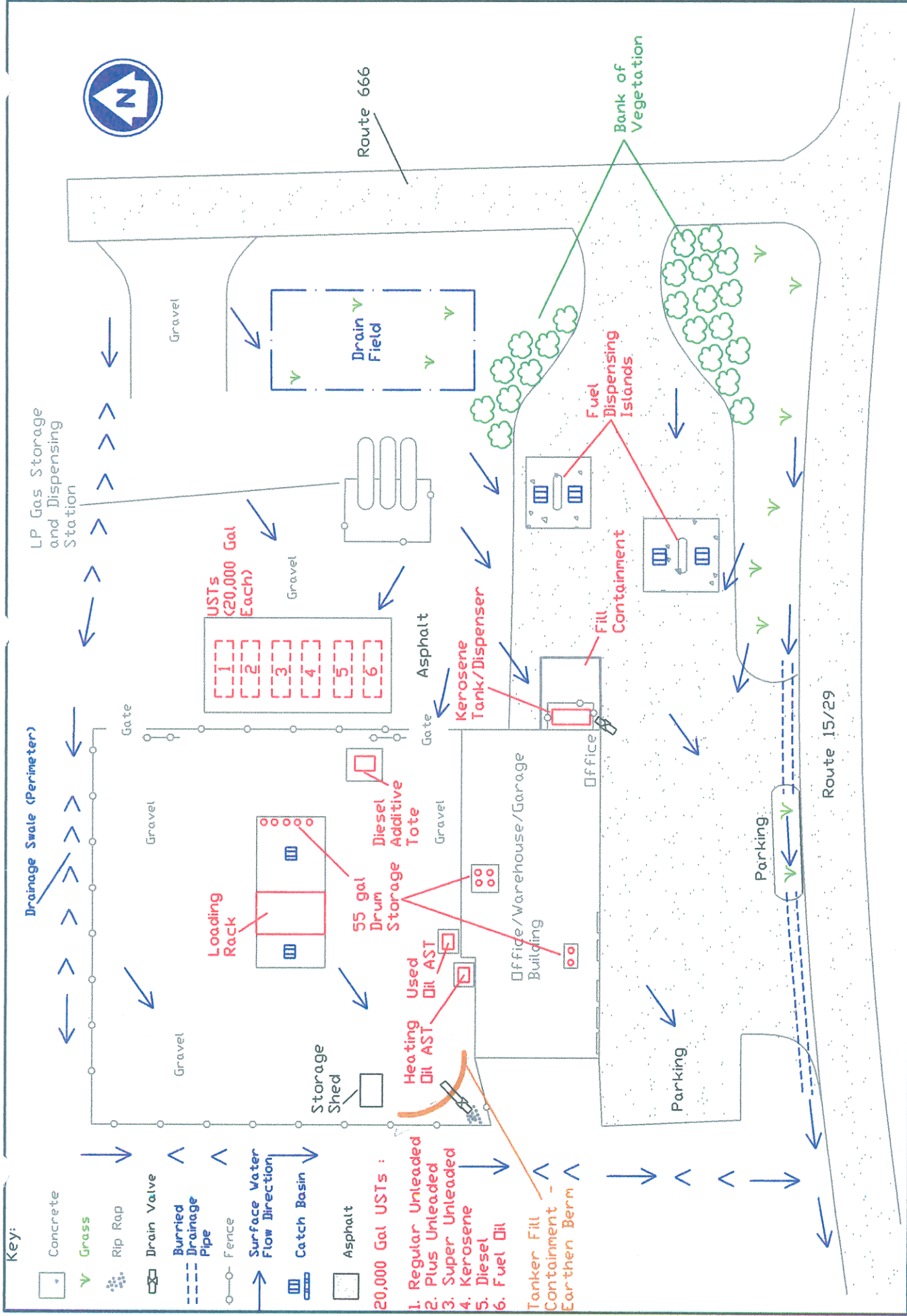
☐ YES; (Add 500 points to the above score and provide reason below:

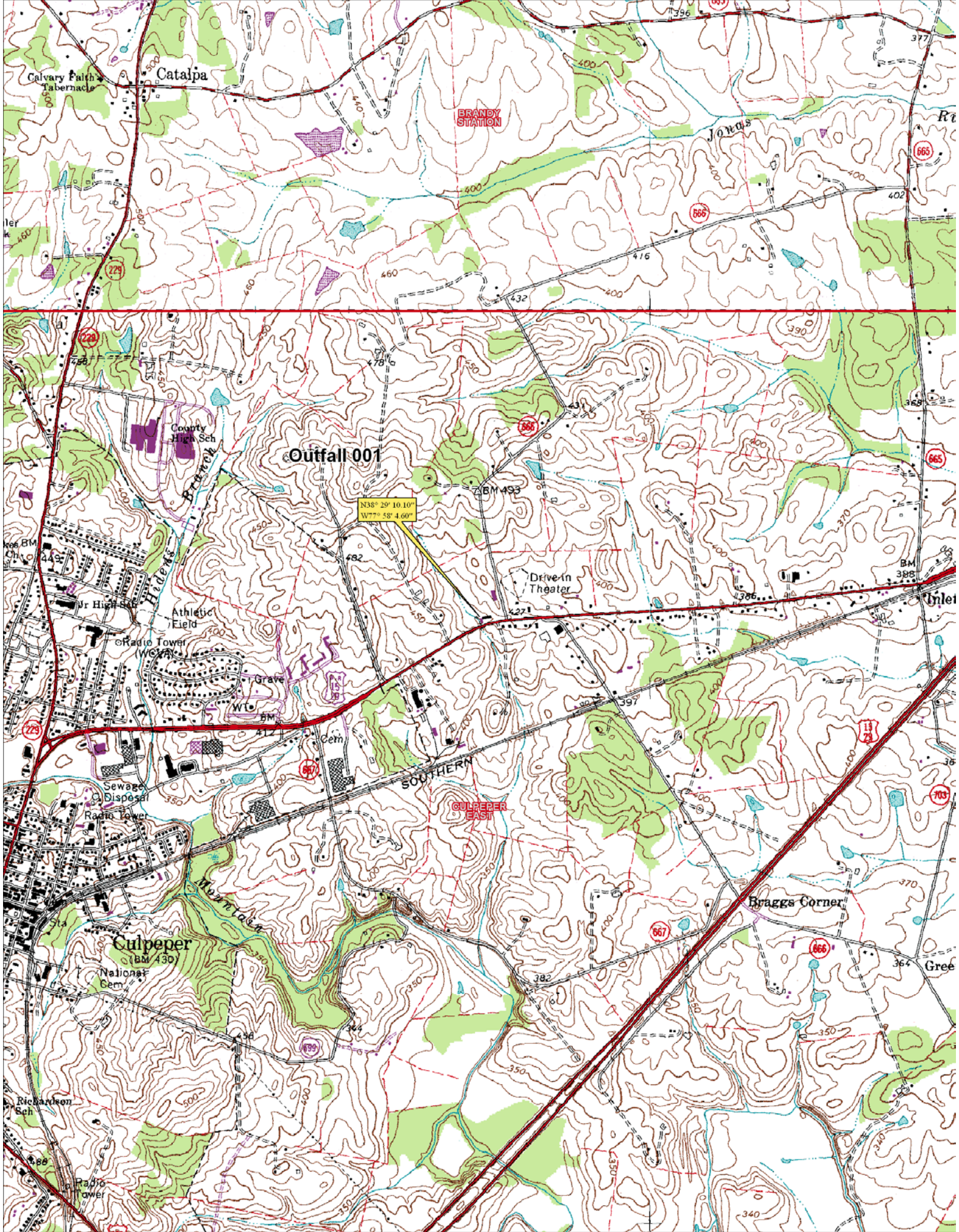
Reason: _____

NEW SCORE : 40

OLD SCORE : 40

Permit Reviewer's Name : Douglas Frasier
Phone Number: (703) 583-3873
Date: 11 February 2008





April 16, 2007

Mr. Kevin Corbin
Culpeper Petroleum Cooperative, Inc
15927 Brandy Road
Culpeper, VA 22701

Re: **Culpeper Petroleum Cooperative, Inc. – VA0085723**

Dear Mr. Corbin:

Attached is a copy of the technical inspection report generated from the Facility Technical Inspection conducted at Culpeper Petroleum Cooperative on March 20, 2007. The compliance/inspection staff would like to thank you and your staff for their time and assistance during the inspection.

Please note the requirements and recommendations addressed in the Compliance Section of this report. The Stormwater Pollution Prevention Plan (SWPPP) was not available during two visits to this facility (March 20, 2007 and April 5, 2007). As a result, this report is being provided with out the benefit of reviewing the facility SWPPP. Please provide a copy as soon as possible (ASAP).

If you have any questions or comments concerning this report, please feel free to contact me at the Northern Virginia Regional Office at (703) 583-3909 or by E-mail at wgharback@deq.virginia.gov.

Sincerely,

Wilamena Harback
Environmental Specialist II

cc: Permits / DMR File
Compliance Manager
Compliance Auditor
Compliance Inspector
OWCP – Steve Stell

**DEQ
INDUSTRIAL FACILITY INSPECTION REPORT
PREFACE**

VPDES/State Certification No.	(RE) Issuance Date	Amendment Date	Expiration Date
VA0085723	June 30, 2003		June 29, 2008
Facility Name		Address	Telephone Number
Culpeper Petroleum Cooperative, Inc.		15297 Brandy Road Culpeper, VA 22701	703-825-9651
Owner Name		Address	Telephone Number
Southern States Cooperative, Inc.		15297 Brandy Road Culpeper, VA 22701	703-825-9651
Responsible Official		Title	Telephone Number
Mr. Kevin Corbin		Facility Manager	703-825-9651
Responsible Operator		Operator Cert. Class/number	Telephone Number
N/A		N/A	N/A

TYPE OF FACILITY:

DOMESTIC				INDUSTRIAL			
Federal		Major		Major		Primary	X
Non-federal		Minor		Minor	X	Secondary	

Outfall 001 EFFLUENT LIMITS: mg/L unless otherwise specified

Parameter	Min.	Avg.	Max.	Parameter	Min.	Avg.	Max.
Flow (MGD)		NL	NL				
pH (su)	6.0		9.0				
TPH			15.0				

	Receiving Stream	UT to Mountain Run	
	Basin	Rappahannock	
	Discharge Point (LAT)	38° 29' 09" N	
	Discharge Point (LONG)	77° 58' 05" W	

UNIT PROCESS: Oil/Water Separator

1. Number of units: **1** Number in operation: **1**
2. Type of separator: [] Modified septic tank [**X**] Commercial Unit [] Other
3. Unit sized for adequate detention/floatation: [**X**] Yes [] No
4. Discharge pipe submerged adequately: [**X**] Yes [] No
5. Type of oil received: **Motor Oil**
6. Depth of oil: **Not measured during inspection.**
7. Cleaning frequency: **Could not be determined at the time of inspection.**
8. Amount of oil recovered at cleaning: **Could not be determined at the time of inspection.**
9. Method of disposal: **Could not be determined at the time of inspection.**
10. Appearance of discharge (visible sheen?): **No discharge at the time of inspection.**

Comments:

UNIT PROCESS: Effluent/Plant Outfall

1. Type Outfall ☒ Shore based ☐ Submerged
2. Type if shore based: ☐ Wingwall ☐ Headwall ☒ Rip Rap
3. Flapper valve: ☐ Yes ☒ No ☐ NA
4. Erosion of bank: ☐ Yes ☒ No ☐ NA
5. Effluent plume visible? ☐ Yes* ☒ No
6. Condition of outfall and supporting structures: ☒ Good ☐ Fair ☐ Poor*
7. Final effluent, evidence of following problems:
 - a. oil sheen ☐ Yes* ☒ No
 - b. grease ☐ Yes* ☒ No
 - c. sludge bar ☐ Yes* ☒ No
 - d. turbid effluent ☐ Yes* ☒ No
 - e. visible foam ☐ Yes* ☒ No
 - f. unusual color ☐ Yes* ☒ No

Comments:

- **At the time of the inspection there was no discharge from the separator. The outfall location and ditch leading to the creek was clean with no visible signs of oil contamination. Due to the fueling islands and loading rack being covered, there is a diminished flow to the oil/water separator and resulting in no routine discharge.**
- **The facility also seems to have recently installed a retention pond to catch area runoff. The area appears to have two lines that can discharge to the same ditch as the oil/water separator; however, each line has its own cut-off valve to prevent drainage.**



NORTHERN VIRGINIA REGIONAL OFFICE
13901 CROWN COURT, WOODBRIDGE, VA. 22193
PHONE: (703) 583-3800 FAX: (703) 583-3871

SITE INSPECTION REPORT

FACILITY NAME:	Culpeper Petroleum Cooperative, Inc.				
PERMIT NUMBER:	VA0085723	INSPECTION DATE:	3/20/07	REPORT DATE:	4/16/07
INSPECTOR:	Wilamena Harback	REVIEWER	DATE		
PRESENT AT INSPECTION:	Ed Stuart – DEQ; Donald - CPC				

Inspection Type:

<input checked="" type="checkbox"/>	Compliance	WL/NOV#:		Announced
	Sampling		<input checked="" type="checkbox"/>	Scheduled
	Other:			

Observation Section:

- ▶ Arrived on-site @ 1315
- ▶ Weather conditions were partly sunny and 65° F.
- ▶ The CPC facility is located on Brandy Road just past the intersection with Rt. 666, just east of the town of Culpeper.
- ▶ The facility includes on-site and bulk delivery sales of gasoline, diesel, kerosene, and propane gas in addition to automotive repair.
- ▶ We introduced ourselves and were greeted by facility staff and informed that Mr. Kevin Corbin was not in due to illness. We explained that the purpose of the inspection was to review CPC's Storm Water Pollution Prevention Plan (SWPPP) for completeness and to compare it with the conditions observed at the facility.
- ▶ The facility staff provided documentation which did not include the SWPPP. The facility staff could not locate a copy of the SWPPP while DEQ was present.
- ▶ The facility staff allowed DEQ to walk the facility to conduct the inspection.
- ▶ Outside facilities consist of:
 - Two self-service pump islands (covered and containing floor drains to the oil/water separator).
 - A fuel loading bay and storage area (covered and containing floor drains to the oil/water separator).

Observation Section:

- Main building with offices/sales and an attached multi-bay automotive repair facilities.
- ▶ The newly built stormwater retention pond was observed to be in good shape.
- ▶ A dumpster was present behind the main building. This dumpster did have petroleum staining on the ground around it and there was a significant odor of petroleum products near the dumpster. Inside the dumpster, DEQ noticed several used oil filters that were lying open on top of other trash items. This dumpster was also rusting along the bottom and is no longer water tight.
- ▶ There were three full drums that were not under cover and were rusting.
- ▶ Outfall 001: UT exits the property after several feet and then goes under the road. The stream conditions down from Outfall 001 were good.
- ▶ Departed site @ 1345.

PHOTOGRAPH LOG

- ▶ Photos taken by Ed Stuart.
- ▶ Photos can be located on the DEQ U drive @ Photos - Water Facilities – Culpeper Petroleum Cooperative (VA0085723).
- ▶ Photos are included with this report.

Compliance Section:

DMR VIOLATION(S): **NA**

INSPECTION VIOLATION(S): **SWPPP not available for review.**

1. **Permit No. VA0085723, Part 1, Page 2, Section B, Number 3, Plan Review, states: "The plan shall be retained on-site at the facility which generates the storm water discharge." At the time of the inspection none of the CPC staff could locate a copy of the SWPPP. A second attempt was made on April 5, 2007 and Mr. Corbin was again out due to illness and the SWPPP could not be located. A message was left with the staff that requested a copy to be provided to DEQ-NVRO as soon as possible so we may determine the compliance status of the facility.**

CAUSE OF VIOLATION(S): **NA**

CORRECTIVE ACTION(S) TAKEN: **NA**

Sampling Section: NA

Facility:	Culpeper Petroleum Cooperative
Address:	15297 Brandy Road
County/city:	Culpeper
Contact/Title	Mr. Kevin Corbin

VPDES NO.	VA0085723
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**DEPARTMENT OF ENVIRONMENTAL QUALITY
STORMWATER GENERAL FACILITY
INSPECTION REPORT**

Inspection date:	3/20/07	Date form completed:	4/20/07
Inspection by:	Wilamena Harback	Inspection agency:	DEQ/NVRO
Time spent:	10 hours		
Reviewed by:			
Present at inspection:	Ed Stuart – DEQ; - CPC		

TYPE OF INSPECTION:				
Routine	X	Reinspection		Compliance/assistance/complaint
Date of previous inspection:		7/26/95	Agency:	DEQ/NVRO
		Other:		

Storm Water P3 available and up dated?	YES		NO	X
Outfalls Identified in SWP3?	YES		NO	X
Site Map with Drainage and Flows available?	YES		NO	X
Has there been any new construction?	YES		NO	X
If yes, were the plans and specifications approved?	YES	NA	NO	
If yes, was SWP3 plan amended?	YES	NA	NO	
Quarterly Visual Results available with SWP3?	YES		NO	X
Site Inspections performed and documented? (Minimum Quarterly)	YES		NO	X
Training performed and documented?	YES		NO	X
Comprehensive Site Evaluation and associated documents available?	YES		NO	X
Non-stormwater certification?	YES		NO	X
Oil or other Hazardous Spills?	YES		NO	
Sampling Required and performed correctly, records available?	YES		NO	X

OVERALL APPEARANCE OF FACILITY	GOOD		AVERAGE	X	POOR	
---------------------------------------	------	--	---------	----------	------	--

PART IV: SECTOR SPECIFIC PERMIT REQUIREMENTS		YES	NO
	Non-stormwater Prohibition		X
	Additional Stormwater Pollution Prevention Plan Requirements; Description of Potential Pollutant Sources Measures & Controls: a. Good Housekeeping b. Preventative Maintenance c. Spill Prevention and Response d. Inspections e. Sediment and Erosion Control f. Comprehensive Site Compliance Evaluation		X X X X X X
	Employee training, recordkeeping and internal records, runoff management? BMPs?		X
SUMMARY			
INSPECTION COMMENTS:			
	There were three full drums that were not under cover with visible rust.		
	The dumpster had a strong smell of petroleum products and inside the dumpster there were two used oil filters in plain sight. Additional staining on the ground in front of the dumpster and around it on the ground cover was visible. The dumpster was rusting and not water tight.		
COMPLIANCE RECOMMENDATIONS FOR ACTION			



1) Filling stations



2) Oil/Water Seperator



3) Three full and rusting drums



4) Dumpster with staining



5) Outfall Pipe with two valves



6) Outfall pipe with receiving stream on the right.

FRESHWATER WATER QUALITY CRITERIA / WASTELOAD ALLOCATION ANALYSIS

Facility Name: Culpeper Petroleum Cooperative

Permit No.: VA0085723

Receiving Stream: Mountain Run, UT

Version: OWP Guidance Memo 00-2011 (8/24/00)

Stream Information

Mean Hardness (as CaCO3) = mg/L
 90% Temperature (Annual) = deg C
 90% Temperature (Wet season) = deg C
 90% Maximum pH = SU
 10% Maximum pH = SU
 Tier Designation (1 or 2) = 1
 Public Water Supply (PWS) Y/N? = n
 Trout Present Y/N? = n
 Early Life Stages Present Y/N? = y

Stream Flows

1Q10 (Annual) = 0 MGD
 7Q10 (Annual) = 0 MGD
 30Q10 (Annual) = 0 MGD
 1Q10 (Wet season) = 0 MGD
 30Q10 (Wet season) = 0 MGD
 30Q5 = 0 MGD
 Harmonic Mean = 0 MGD
 Annual Average = 0 MGD

Mixing Information

Annual - 1Q10 Mix = 100 %
 - 7Q10 Mix = 100 %
 - 30Q10 Mix = 100 %
 Wet Season - 1Q10 Mix = 100 %
 - 30Q10 Mix = 100 %

Effluent Information

Mean Hardness (as CaCO3) = 50 mg/L
 90% Temp (Annual) = 25 deg C
 90% Temp (Wet season) = deg C
 90% Maximum pH = 7.5 SU
 10% Maximum pH = SU
 Discharge Flow = 0.144 MGD

Parameter (ug/l unless noted)	Background Conc.	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
		Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Acenaphthene	0	--	--	na	2.7E+03	--	--	na	2.7E+03	--	--	--	--	--	--	--	--	--	--	na	2.7E+03
Acrolein	0	--	--	na	7.8E+02	--	--	na	7.8E+02	--	--	--	--	--	--	--	--	--	--	na	7.8E+02
Acrylonitrile ^C	0	--	--	na	6.6E+00	--	--	na	6.6E+00	--	--	--	--	--	--	--	--	--	--	na	6.6E+00
Aldrin ^C	0	3.0E+00	--	na	1.4E-03	3.0E+00	--	na	1.4E-03	--	--	--	--	--	--	--	--	3.0E+00	--	na	1.4E-03
Ammonia-N (mg/l) (Yearly)	0	1.99E+01	2.22E+00	na	--	2.0E+01	2.2E+00	na	--	--	--	--	--	--	--	--	--	2.0E+01	2.2E+00	na	--
Ammonia-N (mg/l) (High Flow)	0	1.99E+01	4.36E+00	na	--	2.0E+01	4.4E+00	na	--	--	--	--	--	--	--	--	--	2.0E+01	4.4E+00	na	--
Anthracene	0	--	--	na	1.1E+05	--	--	na	1.1E+05	--	--	--	--	--	--	--	--	--	--	na	1.1E+05
Antimony	0	--	--	na	4.3E+03	--	--	na	4.3E+03	--	--	--	--	--	--	--	--	--	--	na	4.3E+03
Arsenic	0	3.4E+02	1.5E+02	na	--	3.4E+02	1.5E+02	na	--	--	--	--	--	--	--	--	--	3.4E+02	1.5E+02	na	--
Barium	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Benzene ^C	0	--	--	na	7.1E+02	--	--	na	7.1E+02	--	--	--	--	--	--	--	--	--	--	na	7.1E+02
Benzidine ^C	0	--	--	na	5.4E-03	--	--	na	5.4E-03	--	--	--	--	--	--	--	--	--	--	na	5.4E-03
Benzo (a) anthracene ^C	0	--	--	na	4.9E-01	--	--	na	4.9E-01	--	--	--	--	--	--	--	--	--	--	na	4.9E-01
Benzo (b) fluoranthene ^C	0	--	--	na	4.9E-01	--	--	na	4.9E-01	--	--	--	--	--	--	--	--	--	--	na	4.9E-01
Benzo (k) fluoranthene ^C	0	--	--	na	4.9E-01	--	--	na	4.9E-01	--	--	--	--	--	--	--	--	--	--	na	4.9E-01
Benzo (a) pyrene ^C	0	--	--	na	4.9E-01	--	--	na	4.9E-01	--	--	--	--	--	--	--	--	--	--	na	4.9E-01
Bis(2-Chloroethyl) Ether	0	--	--	na	1.4E+01	--	--	na	1.4E+01	--	--	--	--	--	--	--	--	--	--	na	1.4E+01
Bis(2-Chloroisopropyl) Ether	0	--	--	na	1.7E+05	--	--	na	1.7E+05	--	--	--	--	--	--	--	--	--	--	na	1.7E+05
Bromoform ^C	0	--	--	na	3.6E+03	--	--	na	3.6E+03	--	--	--	--	--	--	--	--	--	--	na	3.6E+03
Butylbenzylphthalate	0	--	--	na	5.2E+03	--	--	na	5.2E+03	--	--	--	--	--	--	--	--	--	--	na	5.2E+03
Cadmium	0	1.8E+00	6.6E-01	na	--	1.8E+00	6.6E-01	na	--	--	--	--	--	--	--	--	--	1.8E+00	6.6E-01	na	--
Carbon Tetrachloride ^C	0	--	--	na	4.4E+01	--	--	na	4.4E+01	--	--	--	--	--	--	--	--	--	--	na	4.4E+01
Chlordane ^C	0	2.4E+00	4.3E-03	na	2.2E-02	2.4E+00	4.3E-03	na	2.2E-02	--	--	--	--	--	--	--	--	2.4E+00	4.3E-03	na	2.2E-02
Chloride	0	8.6E+05	2.3E+05	na	--	8.6E+05	2.3E+05	na	--	--	--	--	--	--	--	--	--	8.6E+05	2.3E+05	na	--
TRC	0	1.9E+01	1.1E+01	na	--	1.9E+01	1.1E+01	na	--	--	--	--	--	--	--	--	--	1.9E+01	1.1E+01	na	--
Chlorobenzene	0	--	--	na	2.1E+04	--	--	na	2.1E+04	--	--	--	--	--	--	--	--	--	--	na	2.1E+04

Parameter (ug/l unless noted)	Background Conc.	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
		Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Chlorodibromomethane ^C	0	--	--	na	3.4E+02	--	--	na	3.4E+02	--	--	--	--	--	--	--	--	--	--	na	3.4E+02
Chloroform ^C	0	--	--	na	2.9E+04	--	--	na	2.9E+04	--	--	--	--	--	--	--	--	--	--	na	2.9E+04
2-Chloronaphthalene	0	--	--	na	4.3E+03	--	--	na	4.3E+03	--	--	--	--	--	--	--	--	--	--	na	4.3E+03
2-Chlorophenol	0	--	--	na	4.0E+02	--	--	na	4.0E+02	--	--	--	--	--	--	--	--	--	--	na	4.0E+02
Chlorpyrifos	0	8.3E-02	4.1E-02	na	--	8.3E-02	4.1E-02	na	--	--	--	--	--	--	--	--	--	8.3E-02	4.1E-02	na	--
Chromium III	0	3.2E+02	4.2E+01	na	--	3.2E+02	4.2E+01	na	--	--	--	--	--	--	--	--	--	3.2E+02	4.2E+01	na	--
Chromium VI	0	1.6E+01	1.1E+01	na	--	1.6E+01	1.1E+01	na	--	--	--	--	--	--	--	--	--	1.6E+01	1.1E+01	na	--
Chromium, Total	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Chrysene ^C	0	--	--	na	4.9E-01	--	--	na	4.9E-01	--	--	--	--	--	--	--	--	--	--	na	4.9E-01
Copper	0	7.0E+00	5.0E+00	na	--	7.0E+00	5.0E+00	na	--	--	--	--	--	--	--	--	--	7.0E+00	5.0E+00	na	--
Cyanide	0	2.2E+01	5.2E+00	na	2.2E+05	2.2E+01	5.2E+00	na	2.2E+05	--	--	--	--	--	--	--	--	2.2E+01	5.2E+00	na	2.2E+05
DDD ^C	0	--	--	na	8.4E-03	--	--	na	8.4E-03	--	--	--	--	--	--	--	--	--	--	na	8.4E-03
DDE ^C	0	--	--	na	5.9E-03	--	--	na	5.9E-03	--	--	--	--	--	--	--	--	--	--	na	5.9E-03
DDT ^C	0	1.1E+00	1.0E-03	na	5.9E-03	1.1E+00	1.0E-03	na	5.9E-03	--	--	--	--	--	--	--	--	1.1E+00	1.0E-03	na	5.9E-03
Demeton	0	--	1.0E-01	na	--	--	1.0E-01	na	--	--	--	--	--	--	--	--	--	--	1.0E-01	na	--
Dibenz(a,h)anthracene ^C	0	--	--	na	4.9E-01	--	--	na	4.9E-01	--	--	--	--	--	--	--	--	--	--	na	4.9E-01
Dibutyl phthalate	0	--	--	na	1.2E+04	--	--	na	1.2E+04	--	--	--	--	--	--	--	--	--	--	na	1.2E+04
Dichloromethane (Methylene Chloride) ^C	0	--	--	na	1.6E+04	--	--	na	1.6E+04	--	--	--	--	--	--	--	--	--	--	na	1.6E+04
1,2-Dichlorobenzene	0	--	--	na	1.7E+04	--	--	na	1.7E+04	--	--	--	--	--	--	--	--	--	--	na	1.7E+04
1,3-Dichlorobenzene	0	--	--	na	2.6E+03	--	--	na	2.6E+03	--	--	--	--	--	--	--	--	--	--	na	2.6E+03
1,4-Dichlorobenzene	0	--	--	na	2.6E+03	--	--	na	2.6E+03	--	--	--	--	--	--	--	--	--	--	na	2.6E+03
3,3-Dichlorobenzidine ^C	0	--	--	na	7.7E-01	--	--	na	7.7E-01	--	--	--	--	--	--	--	--	--	--	na	7.7E-01
Dichlorobromomethane ^C	0	--	--	na	4.6E+02	--	--	na	4.6E+02	--	--	--	--	--	--	--	--	--	--	na	4.6E+02
1,2-Dichloroethane ^C	0	--	--	na	9.9E+02	--	--	na	9.9E+02	--	--	--	--	--	--	--	--	--	--	na	9.9E+02
1,1-Dichloroethylene	0	--	--	na	1.7E+04	--	--	na	1.7E+04	--	--	--	--	--	--	--	--	--	--	na	1.7E+04
1,2-trans-dichloroethylene	0	--	--	na	1.4E+05	--	--	na	1.4E+05	--	--	--	--	--	--	--	--	--	--	na	1.4E+05
2,4-Dichlorophenol	0	--	--	na	7.9E+02	--	--	na	7.9E+02	--	--	--	--	--	--	--	--	--	--	na	7.9E+02
2,4-Dichlorophenoxy acetic acid (2,4-D)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
1,2-Dichloropropane ^C	0	--	--	na	3.9E+02	--	--	na	3.9E+02	--	--	--	--	--	--	--	--	--	--	na	3.9E+02
1,3-Dichloropropene	0	--	--	na	1.7E+03	--	--	na	1.7E+03	--	--	--	--	--	--	--	--	--	--	na	1.7E+03
Dieldrin ^C	0	2.4E-01	5.6E-02	na	1.4E-03	2.4E-01	5.6E-02	na	1.4E-03	--	--	--	--	--	--	--	--	2.4E-01	5.6E-02	na	1.4E-03
Diethyl Phthalate	0	--	--	na	1.2E+05	--	--	na	1.2E+05	--	--	--	--	--	--	--	--	--	--	na	1.2E+05
Di-2-Ethylhexyl Phthalate ^C	0	--	--	na	5.9E+01	--	--	na	5.9E+01	--	--	--	--	--	--	--	--	--	--	na	5.9E+01
2,4-Dimethylphenol	0	--	--	na	2.3E+03	--	--	na	2.3E+03	--	--	--	--	--	--	--	--	--	--	na	2.3E+03
Dimethyl Phthalate	0	--	--	na	2.9E+06	--	--	na	2.9E+06	--	--	--	--	--	--	--	--	--	--	na	2.9E+06
Di-n-Butyl Phthalate	0	--	--	na	1.2E+04	--	--	na	1.2E+04	--	--	--	--	--	--	--	--	--	--	na	1.2E+04
2,4 Dinitrophenol	0	--	--	na	1.4E+04	--	--	na	1.4E+04	--	--	--	--	--	--	--	--	--	--	na	1.4E+04
2-Methyl-4,6-Dinitrophenol	0	--	--	na	7.65E+02	--	--	na	7.7E+02	--	--	--	--	--	--	--	--	--	--	na	7.7E+02
2,4-Dinitrotoluene ^C	0	--	--	na	9.1E+01	--	--	na	9.1E+01	--	--	--	--	--	--	--	--	--	--	na	9.1E+01
Dioxin (2,3,7,8- tetrachlorodibenzo-p- dioxin) (ppq)	0	--	--	na	1.2E-06	--	--	na	na	--	--	--	--	--	--	--	--	--	--	na	na
1,2-Diphenylhydrazine ^C	0	--	--	na	5.4E+00	--	--	na	5.4E+00	--	--	--	--	--	--	--	--	--	--	na	5.4E+00
Alpha-Endosulfan	0	2.2E-01	5.6E-02	na	2.4E+02	2.2E-01	5.6E-02	na	2.4E+02	--	--	--	--	--	--	--	--	2.2E-01	5.6E-02	na	2.4E+02
Beta-Endosulfan	0	2.2E-01	5.6E-02	na	2.4E+02	2.2E-01	5.6E-02	na	2.4E+02	--	--	--	--	--	--	--	--	2.2E-01	5.6E-02	na	2.4E+02
Endosulfan Sulfate	0	--	--	na	2.4E+02	--	--	na	2.4E+02	--	--	--	--	--	--	--	--	--	--	na	2.4E+02
Endrin	0	8.6E-02	3.6E-02	na	8.1E-01	8.6E-02	3.6E-02	na	8.1E-01	--	--	--	--	--	--	--	--	8.6E-02	3.6E-02	na	8.1E-01
Endrin Aldehyde	0	--	--	na	8.1E-01	--	--	na	8.1E-01	--	--	--	--	--	--	--	--	--	--	na	8.1E-01

Parameter (ug/l unless noted)	Background Conc.	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
		Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Ethylbenzene	0	--	--	na	2.9E+04	--	--	na	2.9E+04	--	--	--	--	--	--	--	--	--	--	na	2.9E+04
Fluoranthene	0	--	--	na	3.7E+02	--	--	na	3.7E+02	--	--	--	--	--	--	--	--	--	--	na	3.7E+02
Fluorene	0	--	--	na	1.4E+04	--	--	na	1.4E+04	--	--	--	--	--	--	--	--	--	--	na	1.4E+04
Foaming Agents	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Guthion	0	--	1.0E-02	na	--	--	1.0E-02	na	--	--	--	--	--	--	--	--	--	--	1.0E-02	na	--
Heptachlor ^C	0	5.2E-01	3.8E-03	na	2.1E-03	5.2E-01	3.8E-03	na	2.1E-03	--	--	--	--	--	--	--	--	5.2E-01	3.8E-03	na	2.1E-03
Heptachlor Epoxide ^C	0	5.2E-01	3.8E-03	na	1.1E-03	5.2E-01	3.8E-03	na	1.1E-03	--	--	--	--	--	--	--	--	5.2E-01	3.8E-03	na	1.1E-03
Hexachlorobenzene ^C	0	--	--	na	7.7E-03	--	--	na	7.7E-03	--	--	--	--	--	--	--	--	--	--	na	7.7E-03
Hexachlorobutadiene ^C	0	--	--	na	5.0E+02	--	--	na	5.0E+02	--	--	--	--	--	--	--	--	--	--	na	5.0E+02
Hexachlorocyclohexane																					
Alpha-BHC ^C	0	--	--	na	1.3E-01	--	--	na	1.3E-01	--	--	--	--	--	--	--	--	--	--	na	1.3E-01
Hexachlorocyclohexane																					
Beta-BHC ^C	0	--	--	na	4.6E-01	--	--	na	4.6E-01	--	--	--	--	--	--	--	--	--	--	na	4.6E-01
Hexachlorocyclohexane																					
Gamma-BHC ^C (Lindane)	0	9.5E-01	na	na	6.3E-01	9.5E-01	--	na	6.3E-01	--	--	--	--	--	--	--	--	9.5E-01	--	na	6.3E-01
Hexachlorocyclopentadiene	0	--	--	na	1.7E+04	--	--	na	1.7E+04	--	--	--	--	--	--	--	--	--	--	na	1.7E+04
Hexachloroethane ^C	0	--	--	na	8.9E+01	--	--	na	8.9E+01	--	--	--	--	--	--	--	--	--	--	na	8.9E+01
Hydrogen Sulfide	0	--	2.0E+00	na	--	--	2.0E+00	na	--	--	--	--	--	--	--	--	--	--	2.0E+00	na	--
Indeno (1,2,3-cd) pyrene ^C	0	--	--	na	4.9E-01	--	--	na	4.9E-01	--	--	--	--	--	--	--	--	--	--	na	4.9E-01
Iron	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Isophorone ^C	0	--	--	na	2.6E+04	--	--	na	2.6E+04	--	--	--	--	--	--	--	--	--	--	na	2.6E+04
Kepone	0	--	0.0E+00	na	--	--	0.0E+00	na	--	--	--	--	--	--	--	--	--	--	0.0E+00	na	--
Lead	0	4.9E+01	5.6E+00	na	--	4.9E+01	5.6E+00	na	--	--	--	--	--	--	--	--	--	4.9E+01	5.6E+00	na	--
Malathion	0	--	1.0E-01	na	--	--	1.0E-01	na	--	--	--	--	--	--	--	--	--	--	1.0E-01	na	--
Manganese	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Mercury	0	1.4E+00	7.7E-01	na	5.1E-02	1.4E+00	7.7E-01	na	5.1E-02	--	--	--	--	--	--	--	--	1.4E+00	7.7E-01	na	5.1E-02
Methyl Bromide	0	--	--	na	4.0E+03	--	--	na	4.0E+03	--	--	--	--	--	--	--	--	--	--	na	4.0E+03
Methoxychlor	0	--	3.0E-02	na	--	--	3.0E-02	na	--	--	--	--	--	--	--	--	--	--	3.0E-02	na	--
Mirex	0	--	0.0E+00	na	--	--	0.0E+00	na	--	--	--	--	--	--	--	--	--	--	0.0E+00	na	--
Monochlorobenzene	0	--	--	na	2.1E+04	--	--	na	2.1E+04	--	--	--	--	--	--	--	--	--	--	na	2.1E+04
Nickel	0	1.0E+02	1.1E+01	na	4.6E+03	1.0E+02	1.1E+01	na	4.6E+03	--	--	--	--	--	--	--	--	1.0E+02	1.1E+01	na	4.6E+03
Nitrate (as N)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Nitrobenzene	0	--	--	na	1.9E+03	--	--	na	1.9E+03	--	--	--	--	--	--	--	--	--	--	na	1.9E+03
N-Nitrosodimethylamine ^C	0	--	--	na	8.1E+01	--	--	na	8.1E+01	--	--	--	--	--	--	--	--	--	--	na	8.1E+01
N-Nitrosodiphenylamine ^C	0	--	--	na	1.6E+02	--	--	na	1.6E+02	--	--	--	--	--	--	--	--	--	--	na	1.6E+02
N-Nitrosodi-n-propylamine ^C	0	--	--	na	1.4E+01	--	--	na	1.4E+01	--	--	--	--	--	--	--	--	--	--	na	1.4E+01
Parathion	0	6.5E-02	1.3E-02	na	--	6.5E-02	1.3E-02	na	--	--	--	--	--	--	--	--	--	6.5E-02	1.3E-02	na	--
PCB-1016	0	--	1.4E-02	na	--	--	1.4E-02	na	--	--	--	--	--	--	--	--	--	--	1.4E-02	na	--
PCB-1221	0	--	1.4E-02	na	--	--	1.4E-02	na	--	--	--	--	--	--	--	--	--	--	1.4E-02	na	--
PCB-1232	0	--	1.4E-02	na	--	--	1.4E-02	na	--	--	--	--	--	--	--	--	--	--	1.4E-02	na	--
PCB-1242	0	--	1.4E-02	na	--	--	1.4E-02	na	--	--	--	--	--	--	--	--	--	--	1.4E-02	na	--
PCB-1248	0	--	1.4E-02	na	--	--	1.4E-02	na	--	--	--	--	--	--	--	--	--	--	1.4E-02	na	--
PCB-1254	0	--	1.4E-02	na	--	--	1.4E-02	na	--	--	--	--	--	--	--	--	--	--	1.4E-02	na	--
PCB-1260	0	--	1.4E-02	na	--	--	1.4E-02	na	--	--	--	--	--	--	--	--	--	--	1.4E-02	na	--
PCB Total ^C	0	--	--	na	1.7E-03	--	--	na	1.7E-03	--	--	--	--	--	--	--	--	--	--	na	1.7E-03

Parameter (ug/l unless noted)	Background Conc.	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
		Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Pentachlorophenol ^C	0	7.7E-03	5.9E-03	na	8.2E+01	7.7E-03	5.9E-03	na	8.2E+01	--	--	--	--	--	--	--	--	7.7E-03	5.9E-03	na	8.2E+01
Phenol	0	--	--	na	4.6E+06	--	--	na	4.6E+06	--	--	--	--	--	--	--	--	--	--	na	4.6E+06
Pyrene	0	--	--	na	1.1E+04	--	--	na	1.1E+04	--	--	--	--	--	--	--	--	--	--	na	1.1E+04
Radionuclides (pCi/l except Beta/Photon)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Gross Alpha Activity Beta and Photon Activity (mrem/yr)	0	--	--	na	1.5E+01	--	--	na	1.5E+01	--	--	--	--	--	--	--	--	--	--	na	1.5E+01
Strontium-90	0	--	--	na	4.0E+00	--	--	na	4.0E+00	--	--	--	--	--	--	--	--	--	--	na	4.0E+00
Tritium	0	--	--	na	8.0E+00	--	--	na	8.0E+00	--	--	--	--	--	--	--	--	--	--	na	8.0E+00
Selenium	0	--	--	na	2.0E+04	--	--	na	2.0E+04	--	--	--	--	--	--	--	--	--	--	na	2.0E+04
Silver	0	2.0E+01	5.0E+00	na	1.1E+04	2.0E+01	5.0E+00	na	1.1E+04	--	--	--	--	--	--	--	--	2.0E+01	5.0E+00	na	1.1E+04
Sulfate	0	1.0E+00	--	na	--	1.0E+00	--	na	--	--	--	--	--	--	--	--	--	1.0E+00	--	na	--
1,1,2,2-Tetrachloroethane ^C	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Tetrachloroethylene ^C	0	--	--	na	1.1E+02	--	--	na	1.1E+02	--	--	--	--	--	--	--	--	--	--	na	1.1E+02
Thallium	0	--	--	na	8.9E+01	--	--	na	8.9E+01	--	--	--	--	--	--	--	--	--	--	na	8.9E+01
Toluene	0	--	--	na	6.3E+00	--	--	na	6.3E+00	--	--	--	--	--	--	--	--	--	--	na	6.3E+00
Total dissolved solids	0	--	--	na	2.0E+05	--	--	na	2.0E+05	--	--	--	--	--	--	--	--	--	--	na	2.0E+05
Toxaphene ^C	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Tributyltin	0	7.3E-01	2.0E-04	na	7.5E-03	7.3E-01	2.0E-04	na	7.5E-03	--	--	--	--	--	--	--	--	7.3E-01	2.0E-04	na	7.5E-03
1,2,4-Trichlorobenzene	0	4.6E-01	6.3E-02	na	--	4.6E-01	6.3E-02	na	--	--	--	--	--	--	--	--	--	4.6E-01	6.3E-02	na	--
1,1,2-Trichloroethane ^C	0	--	--	na	9.4E+02	--	--	na	9.4E+02	--	--	--	--	--	--	--	--	--	--	na	9.4E+02
Trichloroethylene ^C	0	--	--	na	4.2E+02	--	--	na	4.2E+02	--	--	--	--	--	--	--	--	--	--	na	4.2E+02
2,4,6-Trichlorophenol ^C	0	--	--	na	8.1E+02	--	--	na	8.1E+02	--	--	--	--	--	--	--	--	--	--	na	8.1E+02
2-(2,4,5-Trichlorophenoxy) propionic acid (Silvex)	0	--	--	na	6.5E+01	--	--	na	6.5E+01	--	--	--	--	--	--	--	--	--	--	na	6.5E+01
Vinyl Chloride ^C	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Zinc	0	--	--	na	6.1E+01	--	--	na	6.1E+01	--	--	--	--	--	--	--	--	--	--	na	6.1E+01
	0	6.5E+01	6.6E+01	na	6.9E+04	6.5E+01	6.6E+01	na	6.9E+04	--	--	--	--	--	--	--	--	6.5E+01	6.6E+01	na	6.9E+04

Notes:

- All concentrations expressed as micrograms/liter (ug/l), unless noted otherwise
- Discharge flow is highest monthly average or Form 2C maximum for Industries and design flow for Municipals
- Metals measured as Dissolved, unless specified otherwise
- "C" indicates a carcinogenic parameter
- Regular WLAs are mass balances (minus background concentration) using the % of stream flow entered above under Mixing Information.
Antidegradation WLAs are based upon a complete mix.
- Antideg. Baseline = (0.25(WQC - background conc.) + background conc.) for acute and chronic
= (0.1(WQC - background conc.) + background conc.) for human health
- WLAs established at the following stream flows: 1Q10 for Acute, 30Q10 for Chronic Ammonia, 7Q10 for Other Chronic, 30Q5 for Non-carcinogens, Harmonic Mean for Carcinogens, and Annual Average for Dioxin. Mixing ratios may be substituted for stream flows where appropriate.

Metal	Target Value (SSTV)
Antimony	4.3E+03
Arsenic	9.0E+01
Barium	na
Cadmium	3.9E-01
Chromium III	2.5E+01
Chromium VI	6.4E+00
Copper	2.8E+00
Iron	na
Lead	3.4E+00
Manganese	na
Mercury	5.1E-02
Nickel	6.8E+00
Selenium	3.0E+00
Silver	4.2E-01
Zinc	2.6E+01

Note: do not use QL's lower than the minimum QL's provided in agency guidance

Revised 2/2003

**State "Transmittal Checklist" to Assist in Targeting
Municipal and Industrial Individual NPDES Draft Permits for Review**

Part I. State Draft Permit Submission Checklist

In accordance with the MOA established between the Commonwealth of Virginia and the United States Environmental Protection Agency, Region III, the Commonwealth submits the following draft National Pollutant Discharge Elimination System (NPDES) permit for Agency review and concurrence.

Facility Name:	Southern States Culpeper Petroleum Cooperative
NPDES Permit Number:	VA0085723
Permit Writer Name:	Douglas Frasier
Date:	13 February 2008

Major []

Minor [X]

Industrial [X]

Municipal []

I.A. Draft Permit Package Submittal Includes:

	Yes	No	N/A
1. Permit Application?	X		
2. Complete Draft Permit (for renewal or first time permit – entire permit, including boilerplate information)?	X		
3. Copy of Public Notice?	X		
4. Complete Fact Sheet?	X		
5. A Priority Pollutant Screening to determine parameters of concern?	X		
6. A Reasonable Potential analysis showing calculated WQBELs?	X		
7. Dissolved Oxygen calculations?			X
8. Whole Effluent Toxicity Test summary and analysis?			X
9. Permit Rating Sheet for new or modified industrial facilities?	X		

I.B. Permit/Facility Characteristics

	Yes	No	N/A
1. Is this a new, or currently unpermitted facility?		X	
2. Are all permissible outfalls (including combined sewer overflow points, non-process water and storm water) from the facility properly identified and authorized in the permit?	X		
3. Does the fact sheet or permit contain a description of the wastewater treatment process?	X		
4. Does the review of PCS/DMR data for at least the last 3 years indicate significant non-compliance with the existing permit?		X	
5. Has there been any change in streamflow characteristics since the last permit was developed?		X	
6. Does the permit allow the discharge of new or increased loadings of any pollutants?		X	
7. Does the fact sheet or permit provide a description of the receiving water body(s) to which the facility discharges, including information on low/critical flow conditions and designated/existing uses?	X		
8. Does the facility discharge to a 303(d) listed water?		X	
a. Has a TMDL been developed and approved by EPA for the impaired water?			X
b. Does the record indicate that the TMDL development is on the State priority list and will most likely be developed within the life of the permit?			X
c. Does the facility discharge a pollutant of concern identified in the TMDL or 303(d) listed water?			X
9. Have any limits been removed, or are any limits less stringent, than those in the current permit?		X	
10. Does the permit authorize discharges of storm water?	X		

I.B. Permit/Facility Characteristics – cont.	Yes	No	N/A
11. Has the facility substantially enlarged or altered its operation or substantially increased its flow or production?		X	
12. Are there any production-based, technology-based effluent limits in the permit?	X		
13. Do any water quality-based effluent limit calculations differ from the State's standard policies or procedures?		X	
14. Are any WQBELs based on an interpretation of narrative criteria?			X
15. Does the permit incorporate any variances or other exceptions to the State's standards or regulations?		X	
16. Does the permit contain a compliance schedule for any limit or condition?		X	
17. Is there a potential impact to endangered/threatened species or their habitat by the facility's discharge(s)?		X	
18. Have impacts from the discharge(s) at downstream potable water supplies been evaluated?	X		
19. Is there any indication that there is significant public interest in the permit action proposed for this facility?		X	
20. Have previous permit, application, and fact sheet been examined?	X		

Part II. NPDES Draft Permit Checklist

Region III NPDES Permit Quality Review Checklist – For Non-Municipals (To be completed and included in the record for all non-POTWs)

II.A. Permit Cover Page/Administration	Yes	No	N/A
1. Does the fact sheet or permit describe the physical location of the facility, including latitude and longitude (not necessarily on permit cover page)?	X		
2. Does the permit contain specific authorization-to-discharge information (from where to where, by whom)?	X		

II.B. Effluent Limits – General Elements	Yes	No	N/A
1. Does the fact sheet describe the basis of final limits in the permit (e.g., that a comparison of technology and water quality-based limits was performed, and the most stringent limit selected)?	X		
2. Does the fact sheet discuss whether “antibacksliding” provisions were met for any limits that are less stringent than those in the previous NPDES permit?	X		

II.C. Technology-Based Effluent Limits (Effluent Guidelines & BPJ)	Yes	No	N/A
1. Is the facility subject to a national effluent limitations guideline (ELG)?		X	
a. If yes, does the record adequately document the categorization process, including an evaluation of whether the facility is a new source or an existing source?			X
b. If no, does the record indicate that a technology-based analysis based on Best Professional Judgement (BPJ) was used for all pollutants of concern discharged at treatable concentrations?	X		
2. For all limits developed based on BPJ, does the record indicate that the limits are consistent with the criteria established at 40 CFR 125.3(d)?	X		
3. Does the fact sheet adequately document the calculations used to develop both ELG and /or BPJ technology-based effluent limits?		X	
4. For all limits that are based on production or flow, does the record indicate that the calculations are based on a “reasonable measure of ACTUAL production” for the facility (not design)?			X
5. Does the permit contain “tiered” limits that reflect projected increases in production or flow?		X	
a. If yes, does the permit require the facility to notify the permitting authority when alternate levels of production or flow are attained?			X
6. Are technology-based permit limits expressed in appropriate units of measure (e.g., concentration, mass, SU)?	X		
7. Are all technology-based limits expressed in terms of both maximum daily, weekly average, and/or monthly average limits?		X	
8. Are any final limits less stringent than required by applicable effluent limitations guidelines or BPJ?		X	

II.D. Water Quality-Based Effluent Limits	Yes	No	N/A
1. Does the permit include appropriate limitations consistent with 40 CFR 122.44(d) covering State narrative and numeric criteria for water quality?	X		
2. Does the record indicate that any WQBELs were derived from a completed and EPA approved TMDL?			X
3. Does the fact sheet provide effluent characteristics for each outfall?	X		
4. Does the fact sheet document that a “reasonable potential” evaluation was performed?	X		
a. If yes, does the fact sheet indicate that the “reasonable potential” evaluation was performed in accordance with the State’s approved procedures?	X		
b. Does the fact sheet describe the basis for allowing or disallowing in-stream dilution or a mixing zone?			X

II.D. Water Quality-Based Effluent Limits – cont.	Yes	No	N/A
c. Does the fact sheet present WLA calculation procedures for all pollutants that were found to have “reasonable potential”?			X
d. Does the fact sheet indicate that the “reasonable potential” and WLA calculations accounted for contributions from upstream sources (i.e., do calculations include ambient/background concentrations where data are available)?			X
e. Does the permit contain numeric effluent limits for all pollutants for which “reasonable potential” was determined?			X
5. Are all final WQBELs in the permit consistent with the justification and/or documentation provided in the fact sheet?	X		
6. For all final WQBELs, are BOTH long-term (e.g., average monthly) AND short-term (e.g., maximum daily, weekly average, instantaneous) effluent limits established?			X
7. Are WQBELs expressed in the permit using appropriate units of measure (e.g., mass, concentration)?	X		
8. Does the fact sheet indicate that an “antidegradation” review was performed in accordance with the State’s approved antidegradation policy?	X		

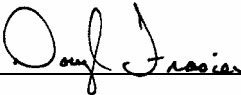
II.E. Monitoring and Reporting Requirements	Yes	No	N/A
1. Does the permit require at least annual monitoring for all limited parameters?	X		
a. If no, does the fact sheet indicate that the facility applied for and was granted a monitoring waiver, AND, does the permit specifically incorporate this waiver?			
2. Does the permit identify the physical location where monitoring is to be performed for each outfall?	X		
3. Does the permit require testing for Whole Effluent Toxicity in accordance with the State’s standard practices?			X

II.F. Special Conditions	Yes	No	N/A
1. Does the permit require development and implementation of a Best Management Practices (BMP) plan or site-specific BMPs?	X		
a. If yes, does the permit adequately incorporate and require compliance with the BMPs?	X		
2. If the permit contains compliance schedule(s), are they consistent with statutory and regulatory deadlines and requirements?			X
3. Are other special conditions (e.g., ambient sampling, mixing studies, TIE/TRE, BMPs, special studies) consistent with CWA and NPDES regulations?			X

II.G. Standard Conditions	Yes	No	N/A
1. Does the permit contain all 40 CFR 122.41 standard conditions or the State equivalent (or more stringent) conditions?	X		
List of Standard Conditions – 40 CFR 122.41			
Duty to comply	Property rights	Reporting Requirements	
Duty to reapply	Duty to provide information	Planned change	
Need to halt or reduce activity	Inspections and entry	Anticipated noncompliance	
not a defense	Monitoring and records	Transfers	
Duty to mitigate	Signatory requirement	Monitoring reports	
Proper O & M	Bypass	Compliance schedules	
Permit actions	Upset	24-Hour reporting	
		Other non-compliance	
2. Does the permit contain the additional standard condition (or the State equivalent or more stringent conditions) for existing non-municipal dischargers regarding pollutant notification levels [40 CFR 122.42(a)]?	X		

Part III. Signature Page

Based on a review of the data and other information submitted by the permit applicant, and the draft permit and other administrative records generated by the Department/Division and/or made available to the Department/Division, the information provided on this checklist is accurate and complete, to the best of my knowledge.

Name	<u>Douglas Frasier</u>
Title	<u>Environmental Specialist II</u>
Signature	<u></u>
Date	<u>13 February 2008</u>